



INSPECTION REPORT
County of Orange, Health Care Agency, Environmental Health
1241 EAST DYER ROAD, SUITE 120 SANTA ANA, CA 92705-5611
(714) 433-6000

**ORANGE COUNTY METAL
PROCESSING
1711 KIMBERLY AVE
FULLERTON, CA 92831**

Record ID: FA0027673
Inspection Date: 04/06/2011
Reinspection Date: 06/06/2011

PR0029523

Mailing Address:
MANUEL REYNOSO
1711 KIMBERLY AVE
FULLERTON, CA 92831

Type of Facility: 5113-HAZARDOUS WASTE GENERATOR
26-50 EMPLOYEES
Service: A01-ROUTINE INSPECTION
Christine Lane, REHS
HAZARDOUS WASTE SPECIALIST III
(714) 433-6243
7:30-8:30 AM

THE ITEMS NOTED BELOW WERE OBSERVED DURING COURSE OF THE SITE VISIT. ANY VIOLATIONS OBSERVED MUST BE CORRECTED

W301 - ACCUMULATION TIMES Generator does not store waste within approved accumulation times:

LQG: 90 days or less (CCR 66262.34(c)(2)).

SQG: 180 days or 270 days if transported more than 200 miles (CCR 66262.34(d)).

CESQG: 90 days after first 100 kg is generated (CCR 66262.34(c)(1)).

Satellite Accumulation (CCR 66262.34(f)(1)&(2)). (CA Code of Regulations 66262.34)

Hazardous wastes stored onsite have exceeded allowable storage limits.

W012 - WASTE DETERMINATION Hazardous waste determination not made for all wastes. (CA Code of Regulations 66262.11)

The standing liquid in the secondary containment of the south plating line is stored and not removed daily. Perform a hazardous waste determination on the standing liquid to determine hazardous properties.

W052 - IDENTIFICATION NUMBERS Generator has not obtained proper identification number. (800) 61-TOXIC (CA Code of Regulations 66262.12(a))

The EPA Identification number for this facility has become inactive. Contact DTSC to reactivate your number.

W312 - ACCUMULATION TIMES Each container and portable tank is not clearly marked with beginning accumulation date. (CA Code of Regulations 66262.34(f)(1)&(2))

The waste paint solids with acetone and the waste oil filters are to be stored in a closed and labeled container, including the accumulation start date. Also, all labeled waste must have accurate accumulation start dates.

W322 - ACCUMULATION TIMES Each container and portable tank is not marked "Hazardous Waste" including: Composition and Physical State of Waste.

Hazardous Properties (i.e. Flammable, Toxic).

Generators Name and Address. (CA Code of Regulations 66262.34(f)(3))

The waste paint solids with acetone and the waste oil filters are to be stored in a closed container that is properly labeled with all of the required information. Also, ensure all hazardous wastes onsite have all of the required information on the label.

W422 - USE AND MANAGEMENT OF CONTAINERS Containers are not stored closed during transfer and storage. (CA Code of Regulations 66265.173(a))

Waste tank sludge in the large metal bins are not stored closed. Provide a cover to these bins and ensure the waste containers are stored closed when not in use.

W502 - TANK SYSTEMS Generator does not comply with Article 10 (Tank Management standards) except sections 66265.197 & 66265.200. (CA Code of Regulations 66262.34(a)(1))

4/7/2011

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Secondary containment beneath the plating line in the south processing area has standing liquid that is not removed daily.

W602 - PREPAREDNESS AND PREVENTION Facility is not maintained and operated to minimize possibility of fire, explosion, or release of hazardous waste (or hazardous waste constituents) to air, soil, or water. (CA Code of Regulations 66265.31)

Store the waste oil filters in a compatible container that is in good condition and can be stored closed.

W822 - PERSONNEL TRAINING Personnel are not trained within six months of employment or assignment and an annual review. (CA Code of Regulations 66265.16(b)&(c))

The last employee training was conducted on March 31, 2010. Training is to be conducted annually.

COMMENTS**ZZZ9 - INSPECTOR COMMENTS**

Onsite this date to conduct a routine hazardous waste inspection. Met with Manuel Reynoso, President, who accompanied me during the inspection.

Inspected facility and waste storage areas. Facility generates waste filter cake from Chromium and Cyanide treatment conducted onsite, as well as waste oil, waste oil filters, waste paint/thinner solids (acetone), and waste concrete and wood. The waste concrete and wood are floor surfaces contaminated by hazardous materials from the plating line that is periodically removed from the plating room. Wastes are stored in varying size containers, including 5 gallon buckets, 55 gallon drums, 6' long by 3' wide by 6' high steel bins, and a roll off bin (approximately 30 yard capacity).

Observed numerous hazardous waste containers with labels that were faded (illegible), labeled improperly/missing information, or with accumulation start dates that were either not updated or have greatly exceed allowable storage limits. For example, the wastes stored were not marked with physical state or hazardous properties, the D.O.T. proper shipping name was listed as "slash from the bottom of the tank", and accumulation start dates for all wastes were listed as 6-21-10 or 7-21-10. The "slash" in the waste description is supposed to be sludge. See violations.

There is one roll-off bin, approximately 30 yard capacity, onsite that had an accumulation start date of 6-21-10. Mr. Reynoso stated that approximately 3-4 drums of filter cake is stored inside to help dry out the filter cake. When the bin was opened, however, broken contaminated concrete and floor material was observed filling approximately half of the bin. Mr. Reynoso stated the filter cake is under the concrete. It was recommended to Mr. Reynoso during previous inspections that he remove the bin from the facility, as disposing waste in that amount would put the facility into RCRA Large Quantity Generator status.

In the maintenance room, a stainless steel bin approximately 6' long by 3' wide by 6' high was observed with a hazardous waste label with an accumulation start date of 7-21-10 and a content description of "Slash from the bottom of the tank". Mr. Reynoso stated there is waste inside the bin, but it could not be verified. The waste bin does not have a lid. In this same room, three other waste containers were packaged and ready for disposal per Mr. Reynoso. Two, 4' X 4' containers approximately 2' high, and a 5' X 3' container approximately 2' high were labeled as "Slash from the bottom of the tank" and all had an accumulation start date of 7-21-10. Also observed in this area were four, 55 gallon drums in secondary containment with the same labeling as the other waste containers in this room.

We moved into the north side processing area and found a 55 gallon drum labeled as "Slash from the bottom of the tank" with an accumulation start date of 7-21-10. Next to this waste container was a 55 gallon drum of waste paint and filters with an accumulation start date of 7-21-10.

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In the back paint room, there were three small containers for waste paint and thinner solids. The waste paint solids are disposed to the trash when dry, as the paint is water based per Mr. Reynoso. Mr. Reynoso also stated the containers are used for the storage of solids containing acetone, and then moved to the hazardous waste storage drum at the end of the day. The small containers in this back paint room must be labeled as hazardous waste and completed with all required information even if storing waste solids with acetone just for the day. See violation.

Moving to the south processing room, the waste oil and waste oil filter storage area was inspected. The waste oil had an accumulation start date of 7-21-10. The waste oil filters were draining in open 5 gallon buckets, uncovered. Mr. Reynoso stated the waste filters stay in the buckets until the waste oil is picked up. It was explained to Mr. Reynoso that the waste oil filters must also be stored in a closed and labeled container. See violation.

In the south processing room the plating line was in use. The wood floors were found to be very wet around most of the tanks, from drag out and being hosed down. A few wood planks were lifted and the concrete floor beneath was found to also be very wet with standing liquid in some areas. The aggregate of the concrete floor beneath the tanks was exposed in many areas. Mr. Reynoso stated the floor is cleaned once a week. The concrete floor beneath the tanks is to act as secondary containment in the event of a release, and not for the storage of hazardous waste. Ensure the secondary containment area is free of standing liquid when the plating tanks are no longer in use or at the end of the day; this is to be done daily. Conduct a waste determination on the standing liquid in the secondary containment area to determine hazardous properties. See violations.

Manifests were onsite and reviewed. The following wastes were disposed since the last routine inspection: waste oil, 55 gallons-4-28-10; filter cake, 500 pounds-6-7-10 and 2-14-11; oily absorbent and debris, 450 pounds-6-28-10 and 200 pounds-8-3-10. RCRA LQG status will be evaluated again.

Training records were onsite and reviewed. The last training conducted at this facility occurred on March 31, 2010. Employee training is to be conducted annually. See violation.

A contingency plan is onsite, however, it is a draft.

The EPA Identification number for this facility (CAD064449812) has become inactive according to the Department of Toxic Substances Control (DTSC) website. You can not dispose of hazardous waste without an active EPA Identification number. Work with DTSC to ensure your number is reactivated. See violation.

Perimeter of facility inspected. No run-off was observed. No hazardous waste was observed in the trash.

A continuation of the inspection will occur. Photos were taken this date.

I declare that I have examined and received a copy of this inspection report.

Print Name and Title

MANUEL REYNOSO

Signature

Date

4-3-11

4/7/2011



INSPECTION REPORT
County of Orange, Health Care Agency, Environmental Health
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(714) 433-6000

PR0030592

**ORANGE COUNTY METAL
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FULLERTON, CA 92831

Record ID: FA0027673
Inspection Date: 04/06/2011
Reinspection Date: 06/06/2011

Mailing Address:
MANUEL REYNOSO
1711 KIMBERLY AVE
FULLERTON, CA 92831

Type of Facility: 5511-TP - PERMIT BY RULE
Service: A01-ROUTINE INSPECTION
Christine Lane, REHS
HAZARDOUS WASTE SPECIALIST III
(714) 433-6243
7:30-8:30 AM

THE ITEMS NOTED BELOW WERE OBSERVED DURING COURSE OF THE SITE VISIT. ANY VIOLATIONS OBSERVED MUST BE CORRECTED

X111 - TIERED PERMIT - PBR There is no written inspection log maintained of the inspections conducted. (CA Code of Regulations 67450.3(c)(9)(A), 66265.15)
Inspections have not been conducted. The last inspection in the log was dated August 20, 2010.

X102 - TIERED PERMIT - PBR There is no written inspection schedule (containers - weekly and tanks - daily). (CA Code of Regulations 67450.3(c)(8)(B), 66265.15)
No inspection schedule was available onsite.

X232 - TIERED PERMIT - PBR The exterior of each unit is not marked with name of owner/operator, facility identification number, or an individual serial number. (CA Code of Regulations 67450.3(c)(7))
Many labels were faded or not completed with the FTU number or had an incorrect FTU number..

X322 - GENERAL REQUIREMENTS Owners or operators shall provide initial and annual training to employees, who handle cyanide process solutions, cyanide-containing rinse waters, or manage cyanide-containing aqueous waste, on how to reduce wastes in the production area. (CA Code of Regulations 67450.11(d)(4)(D))
Annual training, which included cyanide processing, was last conducted March 31, 2010. Employee training is to be conducted annually, and is to include handling/management of cyanide .

COMMENTS

ZZZ9 - INSPECTOR COMMENTS

Onsite this date to conduct a routine Tiered Permit Permit-By-Rule inspection. Met with Manuel Reynoso who accompanied me during the inspection.

Inspected waste treatment units. All tanks were labeled, but not all labels were complete. Make all the necessary corrections to the labels so the each tank in each treatment unit is properly labeled. See violation. Secondary containment of waste treatment area was dry.

The written inspection schedule (containers, weekly and tanks, daily) was not onsite. In addition, daily and weekly inspections have not occurred. The last inspection in the written inspection log was dated 8-30-10. Mr. Reynoso stated the inspections have not been conducted. See violations.

The written operating instructions for the Fixed Treatment Units was not available for review this date. Please ensure the written operating instructions are onsite.

Training was last conducted on March 31, 2010. Employee training is to be conducted annually. Ensure employee training is provided. See violation.

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Facility has a discharge permit from the Orange County Sanitation District; Permit #2-1-530, with a coverage period of October 1, 2009 through September 30, 2011.

The Waste Analysis Plan and Closure Plan were onsite and reviewed. Please review the Closure Plan to ensure the correct Fixed Treatment Units are listed in the correct order, as this differs from the annual notification forms submitted in 2010.

Tank containment system was certified by a PE. The stamped and dated document was onsite but the document was not maintained together. The document was dated 3-31-08 by Abbass Ahmadi with PE stamp 43294.

Also, Financial Assurance (FA) documentation has not been received yet by this Agency. Please ensure the required documents are submitted so that you are in compliance with FA requirements. Violations P122 and P132 remain outstanding.

A reinspection will occur. All violations are to be corrected by or before the reinspection date.

I declare that I have examined and received a copy of this inspection report.

Print Name and Title MANUEL REYNOSO

Signature [Signature] Date 4-7-11

4/7/2011



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Reinspection Date:

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MANUEL REYNOSO
1711 KIMBERLY AVE
FULLERTON, CA 92831

Type of Facility: 5113-HAZARDOUS WASTE GENERATOR
26-50 EMPLOYEES
Service: F03-FOLLOW-UP INSPECTION
Christine Lane, REHS
HAZARDOUS WASTE SPECIALIST III
(714) 433-6243
7:30-8:30 AM

COMMENTS

ZZZ9 - INSPECTOR COMMENTS

Onsite this date with Supervisor Royce Long and Kevin Baitx, Hazardous Waste Specialist III, as a follow-up to the Routine Hazardous Waste inspection conducted yesterday. Met with Manuel Reynoso.

Toured facility again with Mr. Long, Mr. Baitx, and Mr. Reynoso to review and verify issues/violations observed during the routine inspection. Mr. Baitx was onsite to assist with sampling if needed. It was determined that samples were to be collected, however, the time and equipment needed to properly collect samples was not available this date. It was scheduled to possibly occur on Monday, April 11, 2011. Mr. Reynoso stated that samples could be collected on Monday, and confirmed that the facility opens at 8:00 a.m. Samples need to be collected and tested to verify if certain wastes are actually hazardous waste.

The violations and observations documented in the routine inspection report were reviewed and discussed with Mr. Reynoso this date, and he appeared to understand. Also discussed with Mr. Reynoso was the need for immediate correction of all violations and to remain in compliance. Enforcement options were briefly discussed. The April 6, 2011 routine inspection report was signed and dated this date by Mr. Reynoso.

To verify RCRA SQG or LQG status, the liquid hazardous waste quantity that goes into the fixed treatment units was discussed. Mr. Reynoso stated that the average amount is 7,000 to 8,000 gallons, but can be as high as 13,000 gallons if extremely busy. More verification is to follow.

Numerous (20+) Hazardous Waste inspection labels were provided this date to Mr. Reynoso. The labels provided are California Hazardous Waste labels and meet all labeling requirements. The information to be completed on the label was reviewed during this inspection.

Follow-up inspections will occur to ensure the facility is in compliance. Mr. Reynoso was advised that he may contact this Agency with questions or if he needs information.

I declare that I have examined and received a copy of this inspection report.

Print Name and Title

Manuel Reynoso

Signature

Date

4/9/2011

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Christine Lane, REHS
HAZARDOUS WASTE SPECIALIST III
(714) 433-6243
7:30-8:30 AM

COMMENTS

ZZZ9 - INSPECTOR COMMENTS

Onsite this date with Supervisor Royce Long and Kevin Baitx, Hazardous Waste Specialist III, as a follow-up to the Routine Tiered Permitting Permit-By-Rule inspection conducted yesterday. Met with Manuel Reynoso.

Toured facility again with Mr. Long, Mr. Baitx, and Mr. Reynoso to review and verify issues/violations observed during the routine inspection. Mr. Baitx was onsite to assist with sampling if needed. It was determined that samples were to be collected, however, the time and equipment needed to properly collect samples was not available this date. It was scheduled to possibly occur on Monday, April 11, 2011. Mr. Reynoso stated that samples could be collected on Monday, and confirmed that the facility opens at 8:00 a.m. Samples need to be collected and tested to verify if certain wastes are actually hazardous waste.

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Follow-up inspections will occur to ensure the facility is in compliance. Mr. Reynoso was advised that he may contact this Agency with questions or if he needs information.

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Print Name and Title

MANUEL REYNOSO

Signature

Date

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26-50 EMPLOYEES

Service: F03-FOLLOW-UP INSPECTION

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Onsite this date to collect samples. Met with Manuel Reynoso, who again consented to sampling.

Sampling of waste was needed to make a waste determination as cited in violation W012 documented in the April 6, 2011 Routine Inspection report. Onsite with me this date from this Agency were the following Environmental Health staff: Darwin Cheng, Supervising Hazardous Waste Specialist; Kevin Baitx, Hazardous Waste Specialist III; Mark Sutphin, Hazardous Waste Specialist III; Tim Grogan, Hazardous Waste Specialist III; and Bri Dewey, Hazardous Waste Specialist III. These Specialists were onsite to conduct and oversee the sampling activities. Four samples were taken this date, and split samples were provided to Mr. Reynoso so that he could conduct his own laboratory testing. Mr. Reynoso stated in our discussion about the testing that he would not test at this time because of money, but would rely on our testing. Waste containers that were ready for shipping were opened for sampling and will need to be closed/secured again.

While onsite this date, the inspection report from activities conducted at this facility on 4-7-11 was discussed and Mr. Reynoso signed the inspection report. A copy of the report was provided to Mr. Reynoso today.

During discussions today, Mr. Reynoso acknowledged that he has a lot of waste onsite (which he believes to be hazardous waste), and that he knows he has only 90 or 180 days to store hazardous waste. Mr. Reynoso also acknowledged that he and I have talked about it before, and that he accepts responsibility as the generator ("I have no one to blame but me"). It was further discussed that disposal of hazardous waste is expensive, but he knows that if the samples come back as hazardous that he will have to dispose of the hazardous waste immediately.

RCRA LQG requirements were discussed, but a determination as to Generator Status will be made once the results from the sampling are returned.

Mr. Reynoso further clarified the waste liquid quantity that enters the treatment units. He stated that most of the liquid is city water (city water bill shown and reviewed) and that a small portion is waste liquid from plating. For example, 7,000 gallons may go into the treatment unit(s) on an average day. Of that 7,000 gallons, 5,000 may be water and 2,000 may be waste liquid.

Further inspections will occur to ensure compliance. Please contact this Agency with questions.

I declare that I have examined and received a copy of this inspection report.

Print Name and Title

Manuel Reynoso

4/11/2011

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Signature

A handwritten signature in black ink, appearing to be "J. Kim", is written over a horizontal line.

Date

A handwritten date "4-11-11" in black ink is written over a horizontal line.

4/11/2011



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COMMENTS

ZZZ9 - INSPECTOR COMMENTS

Onsite this date to conduct sampling activities, and to conduct a follow-up Tiered Permitting Permit By Rule inspection. Met with Manuel Reynoso.

Mr. Reynoso has copied new tank/container inspection checklists and resumed inspections, per the inspection log. However, while I was updating my copy of the layout of the wastewater treatment area, standing liquid was observed in the secondary containment area beneath the sand filter. The standing liquid was dirty/filmy; the quantity could not be determined. Remove the standing liquid from this area, and properly manage/treat/dispose of the liquid waste if it is hazardous. Ensure these findings are documented on the inspection log, and record any follow-up activity.

The treatment units on record for this facility are chrome, cyanide, and batch. If the plating materials or wastes have changed, ensure your annual submittal, Closure Plan, and Waste Analysis Plan are updated. Zinc (cyanide) is used on the plating line, as is chromate.

Photos were taken this date during the inspections and sampling activities.

Follow-up inspections will occur to ensure compliance. Please contact this Agency with questions.

I declare that I have examined and received a copy of this inspection report.

Print Name and Title

Signature

Date

4/11/2011